

1 DAVID L. ANDERSON (CABN 149604)
United States Attorney

2 THOMAS MOORE (ALBN 4305-O78T)
3 Assistant United States Attorney
Chief, Tax Division

4 CYNTHIA L. STIER (DCBN 423256)
5 Assistant United States Attorney
6 Tax Division

7 450 Golden Gate Avenue
San Francisco, California 94546
8 Telephone: (415) 436-7000

9 Attorneys for the United States of America

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 ANTHONY D. MARSHALL,

14 Plaintiff,

15 v.

16 UNITED STATES OF AMERICA,
17 Defendant.

Case No. 3:18-cv-03586-CRB

NOTICE OF SETTLEMENT,
STIPULATION TO DISMISS AND
[PROPOSED] ORDER OF DISMISSAL

19
20 Plaintiff and Defendant, through the undersigned counsel, advise the Court that this matter is
21 settled and that it will take between sixty and ninety days to execute the settlement terms.

22 1. Accordingly, the parties stipulate that this action be dismissed with prejudice, each party
23 to bear its own costs and attorney's fees.

24 2. The parties further stipulate that if a party certifies to this Court, with proof of service on
25 opposing counsel, within ninety days from the date of the Order of Dismissal, that any settlement term


26 //

27 //

28 Case No. 3:18-cv-03586-CRB
Request For Dismissal & [proposed] Order
of Dismissal

1 was not performed, the Order of Dismissal shall be vacated, and a case management conference be
2 scheduled.

3 Respectfully submitted,
4 DAVID L. ANDERSON
5 United States Attorney


6 
7 FRAMTA SAECHAO
8 Law Offices of Robert Goldstein
9 Attorney for Plaintiff

10 /s/ Cynthia Stier
11 CYNTHIA STIER
12 Assistant United States Attorney
13 Tax Division
14 Attorneys for the United States of America

15 ORDER OF DISMISSAL

16 For the reasons set forth above, it is hereby ORDERED, ADJUDGED and DECREED that this
17 action is dismissed pursuant to Rule 41(a)(1)(A)(ii) of the Fed.R.Civ.Pro., each party to bear its own
18 costs, including attorney fees.

19 Dated: February 12, 2019

20 
21 HONORABLE CHARLES R. BREYER
22 UNITED STATES DISTRICT JUDGE
23
24
25
26
27